

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

H.B.,	:	
	:	
Plaintiff,	:	
	:	CIVIL ACTION FILE NO.
v.	:	1:22-cv-01181-JPB
	:	
RED ROOF INNS, INC. et al.,	:	
	:	
Defendants.	:	

**PLAINTIFF’S MOTION TO EXCLUDE PORTIONS OF THE REPORTS
AND TESTIMONY OF DEFENDANTS’ EXPERTS REFERRING TO
PLAINTIFF’S ATTORNEYS AS AMBULANCE-CHASING SHYSTERS
AND OTHER IRRELEVANT OPINIONS**

COMES NOW, Plaintiff and hereby moves to exclude portions of the reports and testimony of Defendants’ experts Dr. Kimberly Mehlman-Orozco and Michael Seid due to the irrelevancy of the opinions to the instant case. Plaintiff asks the Court to exclude the topics discussed in Plaintiff’s Brief.

Along with this Motion, Plaintiff submits her brief in support for the Court’s review.

Respectfully submitted this 18th day of September, 2023.

ANDERSEN, TATE, AND CARR, P.C.

/s/ Jonathan S. Tonge
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RULE 7.1(D) CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D) of the United States District Court of the Northern District of Georgia, the undersigned certifies that the foregoing submission to the Court was computer-processed, double-spaced between lines, and used Times New Roman font of 14-point size.

Respectfully submitted this 18th day of September, 2023.

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Defendants.	:	

CERTIFICATE OF SERVICE

This is to certify that I have this day presented the foregoing to the Clerk of Court for filing and uploading to the CM/ECF system, which will send notice to counsel of record

Respectfully submitted this 18th day of September, 2023.

ANDERSEN, TATE, AND CARR, P.C.

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